

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**RANDY YOUNG,
Plaintiff,**

v.

**Civil Action No. 2:23-cv-00764
Honorable Thomas E. Johnston**

**WESTERN-SOUTHERN AGENCY, INC.
a/k/a WESTERN & SOUTHERN
FINANCIAL GROUP, WESTERN-
SOUTHERN LIFE ASSURANCE
COMPANY a/k/a WESTERN &
SOUTHERN LIFE INSURANCE
COMPANY,
Defendants.**

AMENDED STIPULATION

NOW COMES the Plaintiff, Randy Young, by counsel, Charles R. Bailey and the law firm of Bailey & Wyant, PLLC and Western & Southern Agency, Inc. a/k/a Western & Southern Financial Group, Western-Southern Life Assurance Company a/k/a Western & Southern Life Insurance Company, by counsel, Joseph M. Ward and the law firm of Frost Brown & Todd LLP and hereby stipulate that counsel for Randy Young shall have until January 30, 2024 to file a response to Defendants' Motion to Dismiss and Defendant shall have until February 8, 2024 to file a reply to Plaintiff's Response to Defendants' Motion to Dismiss.

Entered this 26th day of January, 2024.

**/s/ Charles R. Bailey
Charles R. Bailey (WV Bar #0202)
BAILEY & WYANT, PLLC
500 Virginia Street, East, Suite 600
Post Office Box 3710
Charleston, West Virginia 25337-3710
T: 304.345.4222**

F: 304.343.3133

cbailey@baileywyant.com

Counsel for Randy Young

/s/ Joseph M. Ward (w/permission)

Joseph M. Ward (WV Bar #9733)

Frost Brown Todd LLP

500 Virginia St. E, Ste 1100

Charleston, WV 25301-3204

jward@fbtlaw.com

Counsel for Western & Southern Agency, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

RANDY YOUNG,
Plaintiff,

v.

**Civil Action No. 2:23-cv-00764
Honorable Thomas E. Johnston**

**WESTERN-SOUTHERN AGENCY, INC.
a/k/a WESTERN & SOUTHERN
FINANCIAL GROUP, WESTERN-
SOUTHERN LIFE ASSURANCE
COMPANY a/k/a WESTERN &
SOUTHERN LIFE INSURANCE
COMPANY,
Defendants.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing **“AMENDED STIPULATION”** was served upon the following parties through the Court’s Electronic Case Filing (ECF) system on this day, January 26, 2024:

Joseph M. Ward
Frost Brown Todd LLP
500 Virginia St. E, Ste 1100
Charleston, WV 25301-3204
Attorney For: Western-Southern Agency, Inc.

/s/ Charles R. Bailey
Charles R. Bailey (WV Bar #0202)
BAILEY & WYANT, PLLC
500 Virginia Street, East, Suite 600
Post Office Box 3710
Charleston, West Virginia 25337-3710
T: 304.345.4222
F: 304.343.3133
cbailey@baileywyant.com
Counsel for Randy Young